

REMARKS

Claims 1, 2, 4-20, 22-33, 35-41, 43-48, 50-58, 60-67, 69-74, 76-97 remain in the application for consideration. In view of the following remarks, Applicant respectfully requests withdrawal of the rejections.

§ 101 Rejections

Claims 91-97 stand rejected under 35 U.S.C. §101 because, in the Office's view, the claimed subject matter is related to non-statutory subject matter. While Applicant disagrees, claims 91 and 97 have been amended in response to the Office's rejections. In light of the current amendments, the Applicant respectfully requests withdrawal of the rejections.

§ 103 Rejections

Claims 1, 2, 4-20, 22-33, 35-41, 43-48, 50-58, 60-67, 69-74, and 76-97 stand rejected under U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,125,446 to Olarig et al. (hereafter "Olarig") in view of U.S. Patent No. 5,953,722 to Lampert et al. (hereinafter "Lampert").

A discussion of the Applicant's disclosure as well as the Lampert reference has been provided below for the convenience of the Office.

Applicant's Disclosure

Various embodiments described in Applicant's disclosure pertain to *hierarchical tree structures* that uniquely identify geographical divisions of the Earth and/or physical or logical entities. In at least some embodiments, each tree has multiple nodes and at least one node from each tree is linked. *Goods and*

1 *services can be associated with individual nodes on the tree, the nodes providing*
2 *a universal reference when attempting to locate or consume the goods or*
3 *services.*

4 In at least some embodiments, a Master World is a hierarchical tree
5 structure of nodes that represents a universally acceptable description of the world.
6 Each node represents some aspect of the world and is connected to at least one
7 other node by a branch. An exemplary classification of nodes takes place on a
8 physical level (e.g. physical locations such as political entities, infrastructure
9 entities and public places), as well as a non-physical level (e.g. military APOs).

10 Once an individual's location or a place an individual is interested in is
11 determined, various services that reference the location can be offered to the
12 individual based on their location. *That is, value is provided by the Master World*
13 *model in the ability to tie services to nodal locations in the Master World.*

14 In at least some embodiments, a *Secondary World is also a hierarchical*
15 *tree structure of nodes.* A Secondary World is a powerful computing mechanism
16 whereby individual entities (such as businesses or organizations) can define their
17 own particular worlds that need not necessarily conform to the Master World view
18 of the world. That is, while the Master World is essentially a physical hierarchical
19 representation of the world, the Secondary Worlds can be physical and/or logical
20 representations of each individual entities' world view. *One particularly useful*
21 *aspect of the Secondary World is that it links, at least one point, into the Master*
22 *World.* Thus, within any Secondary World, in at least some embodiments, a user's
23 location not only within the Secondary World, but the Master World as well can be
24 determined. *Various services can be attached to the nodes of the Secondary*
25 *World.* Based upon a user's calculated position, these various services that are

1 associated with Secondary World nodes can be offered to the user. In addition,
2 because the user's context is determined relative to the Master World, other
3 services that may not be associated with a particular Secondary World can be
4 offered.

6 **The Lampert Reference**

7 Lampert teaches a system and method for making and using a geographic
8 database. The geographic database represents a geographic region and is used with
9 a navigation application program. The geographic database includes a *plurality of*
10 *data entities each of which represents a physical feature in the geographic*
11 *region*. The plurality of data entities are separated into a plurality of parcels each
12 of which contains a grouping of data entities that represent features in the
13 geographic area encompassed within a separate one of a plurality of rectangles
14 which together encompass all the features in the entire geographic region
15 represented by all of the plurality of data entities. Each of the plurality of data
16 entities has a data entity ID. The data entities contained in each of the plurality of
17 parcels define an associated range of data entity ID's associated with their
18 respective parcel such that the range of data entity ID's associated with each parcel
19 does not overlap the range of data entity ID's associated with any another of the
20 plurality of parcels.

21 Lampert teaches the use of *one searchable kd-tree structure* associated
22 with the geographic database, whose nodes represent divisions of the geographic
23 region into the rectangles from which the parcels are formed. The kd-tree structure
24 permits spatial searching for a parcel based upon geographic coordinates.

25 Lampert does not teach that entity ID's can serve as a basis by which

1 attributes can be assigned to goods or services associated with an individual node.
2 For instance, in one type of geographic database, there is at least one database
3 entry (also referred to as "entity" or "record") for each road segment in a
4 geographic region. This road segment data record may have associated with it
5 *information that allows identification of the nodes associated with the road*
6 *segment and/or the geographic positions* (e.g. the latitude and longitude
7 coordinates) of the two nodes. *In addition, the database road segment record may*
8 *have associated with it information that specify the speed of travel on the portion*
9 *of the roadway represented by the road segment record, the direction of travel*
10 *permitted on the road portion represented by the road segment record, the name*
11 *of the road represented by the road segment record, what if any turn restrictions*
12 *exist at each of the nodes which correspond to intersections at the ends of the*
13 *road portion represented by the road segment record, street address ranges of*
14 *the roadway represented by the road segment record, and so on.*

15 The Claims

16 **Claim 1** recites a computing device comprising [emphasis added]:

- 17
- 18 • one or more processors;
- 19 • memory operably associated with the one or more processors;
- 20 • one or more applications loadable in the memory and executable
on the one or more processors; and
- 21 • the one or more processors being configured to:
 - 22 ○ receive context information from externally of the device,
the context information pertaining to one or more current
device contexts;
 - 23 ○ automatically determine one or more current contexts
from the context information using one or more
24 hierarchical traversable tree structures, wherein the tree
25 structures comprise individual nodes individual ones of

1 which being associated with a context, wherein said one
2 or more current contexts are determined by traversing at
3 least one node on at least one of the tree structures,
4 wherein individual nodes comprise an entity identification
(EID) that is unique to the node, *EIDs serving as a basis
by which attributes can be assigned to goods or services
associated with an individual node*;

- 5 ○ locally evaluate a collection of policies in connection with
6 the one or more current contexts to provide a resultant set
7 of policies; and
- 8 ○ enforce the resultant set of policies on the one or more
9 applications.

10 In making out the rejection of this claim, the Office asserts that its subject
11 matter would have been obvious in view of the teachings of Olarig and Lampert.
12 The Office argues that one of ordinary skill in the art would have been motivated
13 to consider the use of tree structures and entity IDs in the invention of Olarig as
14 they provided *efficient and quick* operation of navigation systems. The Office
15 argues that an ordinary artisan also would have been motivated to consider
16 incorporating such features as Lampert disclosed them to be *advantageous in
systems with limited memory resources*.” (See Office Action page 6) (emphasis
17 added).

18 Applicant respectfully disagrees and submits that the Office has not
19 established a *prima facie* case of obviousness. Specifically, the Office has failed
20 to assert that either Olarig or Lambert disclose EIDs serving as a basis by which
21 attributes can be assigned to *goods or services* associated with an individual node.

22 It is understandable that the Office has failed to assert that Olarig or
23 Lampert disclose this subject matter because neither reference teaches or in any
24 way mentions EIDs serving as a basis by which attributes can be assigned to *goods
25 or services* associated with an individual node. As discussed above, Lampert

1 discloses a geographic database that may have information associated with each
2 node, such as speed of travel, the direction of travel permitted, or the name of the
3 road represented by the road segment record. None of this *information* can be
4 considered goods or services as claimed. To the extent that the Office admits that
5 Olarig does not disclose the use of trees, Olarig adds nothing of significance.

6 In view of the above discussion, the Office's rejection is incomplete and
7 does not establish a *prima facie* case of obviousness. Hence, for at least these
8 reasons, this claim is allowable.

9 **Claims 2 and 4-12** depend from claim 1 and are allowable as depending
10 from an allowable base claim. These claims are also allowable for their own
11 recited features which, in combination with those recited in claim 1, are neither
12 disclosed nor suggested in the references of record, either singly or in combination
13 with one another.

14 **Claim 13** recites a computing device comprising [emphasis added]:

- 15
- 16 • one or more processors;
- 17 • memory operably associated with the one or more processors;
- 18 • one or more applications loadable in the memory and executable on
the one or more processors; and
- 19 • the one or more processors being configured to:
 - 20 ○ receive context information from externally of the device, the
21 context information pertaining to a current device context and
22 determine a current context using one or more hierarchical
23 traversable tree structures on the device, wherein the tree
24 structures comprise individual nodes each of which being
associated with a device context, wherein said current context
is determined by traversing at least one node on at least one
of the tree structures, and wherein individual nodes comprise
an entity identification (EID) that is unique to the node, *EIDs
serving as a basis by which attributes can be assigned to
goods or services associated with an individual node*; and
- 25

- enforce a set of policies on the one or more applications, the set of policies pertaining to a current context that is associated with the context information.

In making out the rejection of this claim, the Office relies on the same argument that it made in regard to claim 1. Applicant respectfully disagrees with the Office and maintains that the Office has not established a *prima facie* case of obviousness. Hence, for at least these reasons, this claim is allowable.

Claims 14 and 15 depend from claim 13 and are allowable as depending from an allowable base claim. These claims are also allowable for their own recited features which, in combination with those recited in claim 13, are neither disclosed nor suggested in the references of record, either singly or in combination with one another.

Claim 16 recites a method of operating a computing device comprising [emphasis added]:

- receiving context information from externally of a computing device, the context information pertaining to a current device context;
- automatically determining, with the computing device, a current context using the context information;
- wherein said act of automatically determining comprises:
 - providing one or more hierarchical traversable tree structures on the device, the tree structures comprising individual nodes each of which being associated with a device context, wherein individual nodes comprise an entity identification (EID) that is unique to the node, *EIDs serving as a basis by which attributes can be assigned to goods or services associated with an individual node*; and
 - traversing at least one node on at least one of the tree structures to provide the current context;
- evaluating a collection of policies in connection with the current context to provide a resultant set of policies; and

- enforcing the resultant set of policies on one or more applications that are executable by the computing device.

In making out the rejection of this claim, the Office relies on the same argument that it made in regard to claim 1. Applicant respectfully disagrees with the Office and maintains that the Office has not established a *prima facie* case of obviousness. Hence, for at least these reasons, this claim is allowable.

Claims 17-20 and 22-27 depend from claim 16 and are allowable as depending from an allowable base claim. These claims are also allowable for their own recited features which, in combination with those recited in claim 16, are neither disclosed nor suggested in the references of record, either singly or in combination with one another.

Claim 28 recites a method of operating a computing device comprising [emphasis added]:

- receiving context information from externally of a computing device, the context information pertaining to a current device context;
- automatically determining, with the computing device, a current context using the context information;
- wherein said act of automatically determining comprises:
 - providing one or more hierarchical traversable tree structures on the device, the tree structures comprising individual nodes each of which being associated with a device context, wherein individual nodes comprise an entity identification (EID) that is unique to the node, *EIDs serving as a basis by which attributes can be assigned to goods or services associated with an individual node*; and
 - traversing at least one node on at least one of the tree structures to provide the current context; and
- enforcing a set of policies, which are the result of a collection of policies in connection with the current device context, on one or more applications that are executable by the computing device, the

1 resultant set of policies pertaining to a context that is associated with
2 the context information that is received.

3 In making out the rejection of this claim, the Office relies on the same
4 argument that it made in regard to claim 1. Applicant respectfully disagrees with
5 the Office and maintains that the Office has not established a *prima facie* case of
6 obviousness. Hence, for at least these reasons, this claim is allowable.

7 **Claims 29-31** depend from claim 28 and are allowable as depending from
8 an allowable base claim. These claims are also allowable for their own recited
9 features which, in combination with those recited in claim 28, are neither disclosed
10 nor suggested in the references of record, either singly or in combination with one
11 another.

12 **Claim 32** recites a computing device comprising [emphasis added]:

- 13
- 14 • one or more processors;
- 15 • memory operably associated with the one or more processors;
- 16 • one or more applications loadable in the memory and executable on
the one or more processors; and
- 17 • the one or more processors being configured to:
 - 18 ○ receive context information from externally of the device, the
context information pertaining to a current device context;
 - 19 ○ automatically determine a current context from the context
information using one or more hierarchical traversable tree
20 structures on the device, the tree structures comprising
individual nodes each of which being associated with a device
context, the device being configured to determine its current
21 context by traversing at least one node on at least one of the
tree structures, wherein individual nodes comprise an entity
22 identification (EID) that is unique to the node, *EIDs serving
as a basis by which attributes can be assigned to goods or
23 services associated with an individual node*;
 - 24 ○ locally evaluate a collection of policies in connection with the
current context to provide a resultant set of policies;
- 25

- enforce the resultant set of policies on the one or more applications;
- responsive to receiving context information that indicates a change of current context:
 - locally re-evaluate the collection of policies to provide a new resultant set of policies; and
 - enforce the new resultant set of policies on the one or more applications.

In making out the rejection of this claim, the Office relies on the same argument that it made in regard to claim 1. Applicant respectfully disagrees with the Office and maintains that the Office has not established a *prima facie* case of obviousness. Hence, for at least these reasons, this claim is allowable.

Claims 33 and 35-39 depend from claim 32 and are allowable as depending from an allowable base claim. These claims are also allowable for their own recited features which, in combination with those recited in claim 32 are neither disclosed nor suggested in the references of record, either singly or in combination with one another.

Claim 40 recites a method of operating a computing device comprising [emphasis added]:

- wirelessly receiving context information from externally of a computing device, the context information pertaining to a current device context;
- automatically determining, with the computing device, a current context using the context information;
- wherein said act of automatically determining comprises:
 - providing one or more hierarchical traversable tree structures on the device, the tree structures comprising individual nodes each of which being associated with a device context, wherein individual nodes comprise an entity identification (EID) that is unique to the node, *EIDs serving as a basis by which attributes can be assigned to goods or services associated with an individual node*; and

- traversing at least one node on at least one of the tree structures to provide the current context;
- locally evaluating, with the computing device, a collection of policies in connection with the current context to provide a resultant set of policies;
- enforcing the resultant set of policies on one or more applications that are executable by the computing device;
- determining whether the device's current context has changed and if so, automatically determining a new current context using received context information;
- responsive to determining the new current context, locally re-evaluating, with the computing device, the collection of policies to provide a new resultant set of policies for the new current context; and
- enforcing the new resultant set of policies on the one or more applications.

In making out the rejection of this claim, the Office relies on the same argument that it made in regard to claim 1. Applicant respectfully disagrees with the Office and maintains that the Office has not established a *prima facie* case of obviousness. Hence, for at least these reasons, this claim is allowable.

Claims 41 and 43-45 depend from claim 40 and are allowable as depending from an allowable base claim. These claims are also allowable for their own recited features which, in combination with those recited in claim 40 are neither disclosed nor suggested in the references of record, either singly or in combination with one another.

Claim 46 recites a computing device comprising [emphasis added]:

- one or more processors;
- memory operably associated with the one or more processors;
- one or more applications loadable in the memory and executable on the one or more processors; and
- the one or more processors being configured to:
 - receive location information pertaining to a current device

location;

- automatically determine a current location from the location information using one or more hierarchical traversable tree structures on the device, the tree structures comprising individual nodes each of which being associated with a device location, the device being configured to determine its current location by traversing at least one node on at least one of the tree structures, wherein individual nodes comprise an entity identification (EID) that is unique to the node, *EIDs serving as a basis by which attributes can be assigned to goods or services associated with an individual node*;
- locally evaluate a collection of policies in connection with the current location to provide a resultant set of policies; and
- enforce the resultant set of policies on the one or more applications.

In making out the rejection of this claim, the Office relies on the same argument that it made in regard to claim 1. Applicant respectfully disagrees with the Office and maintains that the Office has not established a *prima facie* case of obviousness. Hence, for at least these reasons, this claim is allowable.

Claims 47, 48 and 50-54 depend from claim 46 and are allowable as depending from an allowable base claim. These claims are also allowable for their own recited features which, in combination with those recited in claim 46 are neither disclosed nor suggested in the references of record, either singly or in combination with one another.

Claim 55 recites a method of operating a computing device comprising [emphasis added]:

- receiving location information pertaining to a current device location;

- 1 • automatically determining, with the computing device, a current
2 location using the location information;
- 3 • wherein said act of automatically determining comprises:
 - 4 ○ providing one or more hierarchical traversable tree structures
5 on the device, the tree structures comprising individual nodes
6 each of which being associated with a device location,
7 wherein individual nodes comprise an entity identification
8 (EID) that is unique to the node, *EIDs serving as a basis by
9 which attributes can be assigned to goods or services
10 associated with an individual node*; and
 - 11 ○ traversing at least one node on at least one of the tree
12 structures to provide the current location;
- 13 • locally evaluating, with the computing device, a collection of
14 policies in connection with the current location to provide a resultant
15 set of policies; and
- 16 • enforcing the resultant set of policies on one or more applications
17 that are executable by the computing device.

18 In making out the rejection of this claim, the Office relies on the same
19 argument that it made in regard to claim 1. Applicant respectfully disagrees with
20 the Office and maintains that the Office has not established a *prima facie* case of
21 obviousness. Hence, for at least these reasons, this claim is allowable.

22 **Claims 56-58 and 60-64** depend from claim 55 and are allowable as
23 depending from an allowable base claim. These claims are also allowable for their
24 own recited features which, in combination with those recited in claim 55 are
25 neither disclosed nor suggested in the references of record, either singly or in
combination with one another.

Claim 65 recites a computing device comprising [emphasis added]:

- one or more processors;
- memory operably associated with the one or more processors;
- one or more applications loadable in the memory and executable on
the one or more processors; and
- the one or more processors being configured to:

- receive location information pertaining to a current device location;
- automatically determine a current location from the location information using one or more hierarchical traversable tree structures on the device, the tree structures comprising individual nodes each of which being associated with a device location, the device being configured to determine its current location by traversing at least one node on at least one of the tree structures, wherein individual nodes comprise an entity identification (EID) that is unique to the node, *EIDs serving as a basis by which attributes can be assigned to goods or services associated with an individual node*;
- locally evaluate a collection of policies in connection with the current location to provide a resultant set of policies;
- enforce the resultant set of policies on the one or more applications; and
- responsive to receiving location information that indicates a change of current location:
 - locally re-evaluate the collection of policies to provide a new resultant set of policies; and
 - enforce the new resultant set of policies on the one or more applications.

In making out the rejection of this claim, the Office relies on the same argument that it made in regard to claim 1. Applicant respectfully disagrees with the Office and maintains that the Office has not established a *prima facie* case of obviousness. Hence, for at least these reasons, this claim is allowable.

Claims 66, 67 and 69-72 depend from claim 65 and are allowable as depending from an allowable base claim. These claims are also allowable for their own recited features which, in combination with those recited in claim 65 are neither disclosed nor suggested in the references of record, either singly or in combination with one another.

1 **Claim 73** recites a method of operating a computing device comprising
2 [emphasis added]:

- 3
- 4 • wirelessly receiving location information from externally of a
5 computing device, the location information pertaining to a current
6 device location;
- 7 • automatically determining, with the computing device, a current
8 location using the location information;
- 9 • wherein said act of automatically determining comprises:
 - 10 ○ providing one or more hierarchical traversable tree structures
11 on the device, the tree structures comprising individual nodes
12 each of which being associated with a device location,
13 wherein individual nodes comprise an entity identification
14 (EID) that is unique to the node, *EIDs serving as a basis by*
15 *which attributes can be assigned to goods or services*
16 *associated with an individual node*; and
 - 17 ○ traversing at least one node on at least one of the tree
18 structures to provide the current location;
- 19 • locally evaluating, with the computing device, a collection of
20 policies in connection with the current location to provide a resultant
21 set of policies;
- 22 • enforcing the resultant set of policies on one or more applications
23 that are executable by the computing device;
- 24 • determining whether the device's current location has changed and if
25 so, automatically determining a new current location using received
 location information;
- responsive to determining the new current location, locally re-
 evaluating, with the computing device, the collection of policies to
 provide a new resultant set of policies for the new current location;
 and
- enforcing the new resultant set of policies on the one or more
 applications.

22 In making out the rejection of this claim, the Office relies on the same
23 argument that it made in regard to claim 1. Applicant respectfully disagrees with
24 the Office and maintains that the Office has not established a *prima facie* case of
25 obviousness. Hence, for at least these reasons, this claim is allowable.

1 **Claims 74 and 76-78** depend from claim 73 and are allowable as
2 depending from an allowable base claim. These claims are also allowable for their
3 own recited features which, in combination with those recited in claim 73 are
4 neither disclosed nor suggested in the references of record, either singly or in
5 combination with one another.

6 **Claim 79** has been amended, and as amended recites a computing device
7 comprising [added language appears in the bold italics]:

- 8 • one or more processors;
- 9 • memory operably associated with the one or more processors;
- 10 • one or more applications loadable in the memory and executable on
11 the one or more processors; and
- 12 • the one or more processors being configured to:
 - 13 ○ collect policies from multiple different policy sources to provide
14 a collection of policies, the policies being expressed in terms of
15 context dependencies associated with multiple different device
16 contexts;
 - 17 ○ receive context information from externally of the device, the
18 context information pertaining to a current device context;
 - 19 ○ automatically determine a current context from the context
20 information, *wherein said act of automatically determining*
21 *comprises:*
 - 22 ○ *using one or more hierarchical traversable tree structures*
23 *on the device, the tree structures comprising individual*
24 *nodes each of which being associated with a device location,*
25 *wherein individual nodes comprise an entity identification*
 (EID) that is unique to the node, EIDs serving as a basis by
 which attributes can be assigned to goods or services
 associated with an individual node;
 - locally evaluate the collection of policies in connection with the
 current context to provide a resultant set of policies; and
 - enforce the resultant set of policies on the one or more
 applications.

In making out the rejection of this claim, the Office relies on the same

1 argument that it made in regard to claim 1. Claim 79 has been amended. In light
2 of the current amendments, and for the same reasons as discussed in claim 1,
3 Applicant respectfully disagrees with the Office and maintains that the Office has
4 not established a *prima facie* case of obviousness. Hence, for at least these
5 reasons, this claim is allowable.

6 **Claims 80 and 81** depend from claim 79 and are allowable as depending
7 from an allowable base claim. These claims are also allowable for their own
8 recited features which, in combination with those recited in claim 79 are neither
9 disclosed nor suggested in the references of record, either singly or in combination
10 with one another

11 **Claim 82** has been amended, and as amended recites a method of operating
12 a computing device comprising [added language appears in the bold italics]:

- 13 • collecting policies from multiple different policy sources to provide
14 a collection of policies, the policies being expressed in terms of
15 context dependencies associated with multiple different device
16 contexts;
- 17 • receiving context information from externally of a computing
18 device, the context information pertaining to a current device
19 context;
- 20 • automatically determining a current context from the context
21 information, *wherein said act of automatically determining*
22 *comprises:*
 - 23 ○ *using one or more hierarchical traversable tree structures*
24 *on the device, the tree structures comprising individual*
25 *nodes each of which being associated with a device location,*
wherein individual nodes comprise an entity identification
(EID) that is unique to the node, EIDs serving as a basis by
which attributes can be assigned to goods or services
associated with an individual node;
- locally evaluating the collection of policies in connection with the
current context to provide a resultant set of policies; and

- enforcing the resultant set of policies on the device.

In making out the rejection of this claim, the Office relies on the same argument that it made in regard to claim 1. Claim 82 has been amended. In light of the current amendments, and for the same reasons as discussed in claim 1, Applicant respectfully disagrees with the Office and maintains that the Office has not established a *prima facie* case of obviousness. Hence, for at least these reasons, this claim is allowable.

Claims 83-87 depend from claim 82 and are allowable as depending from an allowable base claim. These claims are also allowable for their own recited features which, in combination with those recited in claim 82, are neither disclosed nor suggested in the references of record, either singly or in combination with one another.

Claim 88 recites a method of providing policies for enforcement on computing devices comprising [emphasis added]:

- providing a representation of location using *multiple* hierarchical tree structures each of which comprising multiple nodes, *each node representing a location that can be either a physical location or a logical location*, the tree structures comprising at least one link between them that can serve as a basis for a traversal operation that traverses the multiple tree structures to derive a computing device location; and
- expressing multiple policies as a function of the representation of location.

In making out the rejection of this claim, the Office relies on the same argument that it made in regards to claim 1. Applicant is confused as to how that argument is applicable to this claim. For instance, claim 1 does not recite “using

1 *multiple hierarchical tree structures each of which comprising multiple nodes,*
2 *each node representing a location that can be either a physical location or a*
3 *logical location,”* as recited in this claim. Furthermore, the Office does not even
4 suggest that this element is disclosed or suggested by either Olarig or Lampert.
5 Therefore, for at least this reason, the Office has failed to establish a *prima facie*
6 case of obviousness.

7 Additionally, Lampert does not teach or in any way mention the use of
8 multiple hierarchical tree structures. As discussed above, Lampert discloses the
9 use of *one* kd-tree structure.

10 In view of the above discussion, the Office has made an improper rejection
11 and has not established a *prima facie* case of obviousness. Hence, for at least this
12 reasons, this claim is allowable.

13 **Claim 89** depends from claim 88 and is allowable as depending from an
14 allowable base claim. This claim is also allowable for its own recited features
15 which, in combination with those recited in claim 88 are neither disclosed nor
16 suggested in the references of record, either singly or in combination with one
17 another.

18 **Claim 90** recites a method of providing policies for enforcement on
19 computing devices comprising [emphasis added]:

- 20
- 21 • expressing multiple policies as a function of an abstract
22 representation of location that uses *multiple* hierarchical tree
23 structures each of which comprising multiple nodes, *each node*
24 *representing a location that can be either a physical location or a*
25 *logical location*, the tree structures comprising at least one link
between them that can serve as a basis for a traversal operation that
traverses the multiple tree structures to derive a computing device
location; and

- making the multiple policies available to computing devices.

In making out the rejection of this claim, the Office relies on the same argument that it made in regards to claim 1. Applicant is confused as to how that argument is applicable to this claim. For instance, claim 1 does not recite “*using multiple hierarchical tree structures each of which comprising multiple nodes, each node representing a location that can be either a physical location or a logical location,*” as recited in this claim. Furthermore, the Office does not even suggest that this element is disclosed or suggested by either Olarig or Lampert. Therefore, for at least this reason, the Office has failed to establish a *prima facie* case of obviousness.

Additionally, Lampert does not teach or in any way mention the use of multiple hierarchical tree structures. As discussed above, Lampert discloses the use of *one* kd-tree structure.

In view of the above discussion, the Office has made an improper rejection and has not established a *prima facie* case of obviousness. Hence, for at least this reasons, this claim is allowable.

Claim 91 has been amended, and as amended recites a computer architecture *embodied on a computer readable medium* comprising [added language appears in the bold italics above, emphasis added below]:

- a context service that provides context information or context change events that pertain to the context of a computing device;
- wherein said context service determines context using one or more hierarchical traversable tree structures, the tree structures comprising individual nodes each of which being associated with a device context, the context service being configured to determine context by traversing at least one node on at least one of the tree structures,

1 wherein individual nodes comprise an entity identification (EID) that
2 is unique to the node, *EIDs serving as a basis by which attributes*
3 *can be assigned to goods or services associated with an individual*
4 *node*; and

- 5 • a policy engine communicatively linked with the context service and
6 configured to:
 - 7 ○ receive context information or context change events from the
8 context service;
 - 9 ○ evaluate a collection of policies to provide a resultant set of
10 policies responsive to the context information or context
11 change events; and
 - 12 ○ enforce the resultant set of policies on a computing device.

13 In making out the rejection of this claim, the Office relies on the same
14 argument that it made in regards to claim 1. Applicant respectfully disagrees with
15 the Office and maintains its arguments as set forth above in regards to claim 1.

16 In view of the above discussion, the Office has made an improper rejection
17 and has not established a *prima facie* case of obviousness. Hence, for at least
18 these reasons, this claim is allowable.

19 **Claims 92-96** depend from claim 91 and are allowable as depending from
20 an allowable base claim. These claims are also allowable for their own recited
21 features which, in combination with those recited in claim 91, are neither disclosed
22 nor suggested in the references of record, either singly or in combination with one
23 another.

24 **Claim 97** has been amended, and as amended recites a computer system
25 comprising [added language appears in the bold italics, emphasis added below]:

- 26 • *a computer-readable medium;*
- 27 • a context service *embodied on the computer-readable medium and*
28 that provides context information or context change events that
29 pertain to the context of a computing device;
- 30 • wherein said context service determines context using one or more

1 hierarchical traversable tree structures, the tree structures comprising
2 individual nodes each of which being associated with a device
3 context, the context service being configured to determine context
4 by traversing at least one node on at least one of the tree structures,
5 wherein individual nodes comprise an entity identification (EID) that
6 is unique to the node, *EIDs serving as a basis by which attributes*
7 *can be assigned to goods or services associated with an individual*
8 *node;* and

- 9 • a policy engine communicatively linked with the context service, but
10 remote from the computing device, and configured to:
 - 11 ○ receive context information or context change events from the
12 context service;
 - 13 ○ evaluate a collection of policies to provide a resultant set of
14 policies responsive to the context information or context
15 change events; and
 - 16 ○ provide the resultant set of policies to the computing device.

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18 In making out the rejection of this claim, the Office relies on the same
19 argument that it made in regards to claim 1. Applicant respectfully disagrees with
20 the Office and maintains its arguments as set forth above in regards to claim 1.

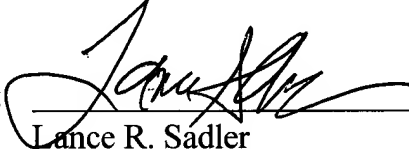
21 In view of the above discussion, the Office has made an improper rejection
22 and has not established a *prima facie* case of obviousness. Hence, for at least
23 these reasons, this claim is allowable.
24
25

1 **Conclusion**

2 All of the claims are in condition for allowance. Applicant respectfully
3 requests a Notice of Allowability be issued forthwith. If the Office issues a final
4 rejection responsive to this response, Applicant will appeal. If the Office's next
5 anticipated action is to be anything other than issuance of a Notice of Allowability,
6 Applicant respectfully requests a telephone call for the purpose of discussing an
7 appeal.

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9 Respectfully Submitted,

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11 Dated: 9/29/05

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15 (509) 324-9256
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